

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
Northern Division

IN RE GRACE OCEAN PRIVATE
LIMITED, *et al.*,

Petitioners.

Civil Action No. 24-cv-000941-JKB

IN ADMIRALTY

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
CLAIMANTS' MOTION TO STRIKE CONFIDENTIALITY DESIGNATIONS**

Pursuant to Local Rule 105.9, nonparty respondent Karthikeyan Deenadayalan (Respondent), on behalf of all respondents to Claimants' motion to strike the confidentiality designations to the M/V Dali Vessel employees' deposition transcripts, hereby moves for a one-week extension to file opposition papers, and in support thereof states:

1. On May 19, 2025, Claimants filed a single motion to strike that applied to eight former crewmembers of the M/V Dali (Crewmembers). None of the Crewmembers is a party in this case and as of the filing of the motion to strike, none of the Crewmembers' counsel have appearances entered in this case.

2. The Crewmembers are represented by lawyers from four different law firms. Three of the lead lawyers for the four Crewmember groups need to retain and work with local counsel, and they need to file motions for admission pro hac vice, so they can fully participate in their clients' responses. This process has created certain administrative delays.

3. To the extent possible, the Crewmembers' lawyers are working together to file nonduplicative responses to the motion to strike, but they anticipate that they will need

to file four different responses, with appropriate incorporations on common issues. This process also creates modest delay in preparing responses, but should promote efficiency for the Court and all parties in adjudicating the motion.

4. Under Local Rule 105.2.a, the Crewmembers' responses are due on June 2, 2025. The Crewmembers request an extension to file their oppositions to and including June 9, 2025.

5. Counsel for Claimants, Robert W. Phelan, has stated that all Claimants consent to the requested extension.

6. Counsel for Petitioners, Kierstan Carlson, has stated that Petitioners consent to the requested extension.

Wherefore, Respondent respectfully requests that the deadline for all Crewmembers' responses to the motion to strike be extended to and including June 9, 2025.

Dated: May 29, 2025

Respectfully submitted,

ZUCKERMAN SPAEDER LLP

By: /s/ John J. Connolly
Gregg L. Bernstein (#01340)
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*Attorneys for Nonparty Respondent
Karthikeyan Deenadayalan*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of May, 2025, I caused copies of the foregoing document to be served through the ECF system on all registered counsel of record.

/s/ John J. Connolly
John J. Connolly (09537)

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**ORDER EXTENDING DEADLINE FOR
RESPONSES TO MOTION TO STRIKE**

UPON CONSIDERATION OF the unopposed motion for extension of time to respond to Claimants' motion to strike confidentiality designations, the consent of Claimants and Petitioners, and the record in this case, it is this ____ day of _____, 2025,

ORDERED that the motion is GRANTED; and it is further

ORDERED that the deadline for all Crewmembers to respond to the motion to strike is extended to and including June 9, 2025.

UNITED STATES DISTRICT JUDGE